



NCI RESPONSE TO DRAFT EPA STRATEGIC PLAN 2022-2026

Below are the questions posed by the EPA regarding their [Strategic Plan 2022-2026](#). (The response via Survey Monkey [questionnaire](#).)

Questions on [EPA Draft Strategic Plan](#)

1. Do you find the EPA Draft Strategy clear and easy to understand? (very unclear – very clear)
2. What aspects of the EPA Draft Strategy do you particularly like/agree with? (Purpose & vision; Values & behaviours; The five strategic outcomes; Our ‘By 2026’ priorities)
3. What aspects of the EPA Draft Strategy do you particularly dislike/disagree with? (Purpose & vision; Values & behaviours; The five strategic outcomes; Our ‘By 2026’ priorities)
4. Please tell us why you like or dislike particular parts of the draft strategy?
5. Are there any additional elements that you feel we should include in the Strategy, that are relevant to the EPA’s remit, and why?

RESPONSE DONE ON [SURVEY MONKEY QUESTIONNAIRE](#) 11 MARCH 2022

Do you find the EPA Draft Strategy clear and easy to understand?



Very unclear

Very unclear because it is so abstract, much of it is a template that could be used by almost any organisation, and so it is not at all clear, for the most part, what specific targets the strategy has, or how they can be achieved.

What aspects of the EPA Draft Strategy do you particularly like/agree with? –No response to this question



Purpose & Vision



Values & Behaviours



The five Strategic Outcomes



Our “By 2026” priorities

What aspects of the EPA Draft Strategy do you particularly dislike/disagree with?



Purpose & Vision - Fine as far as it goes, but very vague

- Values & Behaviours** - Fine as far as it goes, but very shallow
- The five Strategic Outcomes** - If the EPA is THE trusted, independent source of environmental evidence and information, how does the NPWS, and other environmental monitoring bodies, fit in?
- Our “By 2026” priorities** - Sometimes these simply do not make sense. *“No regulated activity will have an impact on the environment and public health”*, for example. All activities have an impact for good or ill, on the environment and public health. The job of the EPA is surely to regulate activities so that these impacts are sustainable or, indeed, restorative of biodiversity and mitigate climate change? And the targets, such as they are, are minimal. Words and phrases like “Increased”, “improved” and “trending in the right direction” are utterly lacking in ambition unless linked to specifics

Please tell us why you like or dislike particular parts of the draft strategy? See above response

Are there any additional elements that you feel we should include in the Strategy, that are relevant to the EPA’s remit, and why?

Natural Capital Ireland (NCI) welcomes the opportunity to input into the Public Consultation on the [EPA Draft Strategic Plan 2022-2026](#). NCI is a not-for-profit organisation leading the national conversation on natural capital (view our website [here](#)). We are a group of organisations and individuals from academia and public, private and NGO sectors interested in the development and application of the natural capital approach to environmental planning in Ireland.

Our response offers a framework which we believe will assist the EPA in assessing more accurately, and more holistically, the benefits and costs of both individual aspects of the Strategy, and its overall national impact.

We believe that the natural capital approach makes visible values (both benefits and costs) that are obscured or invisible in conventional evaluations of the economic and environmental impacts of policies across the whole range of human activity. We therefore propose this approach as a framework in which your Strategy could be embedded, and which can reveal values and relationships within it that would otherwise remain opaque.

NCI’s vision is for an Ireland in which natural capital and ecosystem goods and services are valued, protected and restored. Our mission is to help to value, protect and restore Ireland’s natural capital and ecosystem services. We do this by supporting the adoption of natural capital concepts in public policy and corporate strategy, promoting informed public and private sector decision-making and assisting in the establishment of a national natural capital accounting standard as required by the EU [see below].

Natural capital approaches, and natural capital accounting specifically, present a means to support policy and decision-making with a much wider range of analysis/data than that offered by conventional approaches, because it builds in the fullest possible range of environmental – and cultural – costs and benefits in the assessment of any policy. It is also valuable because it can be used continuously to monitor the full cost-benefit performance of any policy into the future.

The main aim of our submission is to inform on how valuable the natural capital approach would be for EPA Draft Strategic Plan 2022-2026:

Why natural capital?

The topic of natural capital is growing in importance at the European level and nationally:

- In late 2019, the European Green Deal was announced, which states that “*all EU policies should contribute to preserving and restoring Europe’s natural capital*”. In June 2020, the EU published its new Biodiversity Strategy, which states that by 2050, “*the EU’s natural capital will be protected, valued and appropriately restored*”. Further, the Biodiversity Strategy sets a target to bring at least 10% of agricultural land under management for biodiversity.
- The economic benefits delivered by natural capital remain very undervalued and underrepresented in government policy. Properly accounting for natural capital can help make these values visible, revealing both Ireland’s hidden wealth which enriches us, and the hitherto invisible factors that, by degrading natural capital, impoverish us. Natural capital concepts are already found in a range of flagship national policies, including the National Planning Framework, the National Biodiversity Action Plan 2017-2021, the National Adaptation Framework, and Heritage Ireland 2030 – but much more can be done to embed natural capital thinking in decision making. The 4th National Biodiversity Action Plan 2022-2026 is currently being drafted and it is anticipated that the natural capital approach and natural capital accounting will be incorporated into the Plan, in line with EU-wide adoption of the UN System of Environmental Economic Accounting ([SEEA](#)) (information on the SEEA in the next section), and proposed changes to the EU Regulation on Environmental Economic Accounts. As part of natural capital accounting, Ecosystem Accounting ([SEEA-EA](#)) aims to reorient policies to deliver sustainable development and improved human well-being by measuring and valuing the extent, condition and services of Irish ecosystems as part of the System of National Accounts under the Central Statistics Office’s [Irish ecosystem accounting](#).
- The recent World Economic Forum’s Global Risks Report (2022), states that the top three most severe global risks are climate inaction, extreme weather, and biodiversity loss; all of which are inter-related risks that compound each other. These risks are a direct threat to our natural capital, and also stem largely from our failure to conserve and restore it.

How can the natural capital approach support the Public Consultation on the EPA Draft Strategic Plan 2022-2026?

Incorporation of the natural capital approach and natural capital accounting would marry well with the stated purpose of the EPA Draft Strategic Plan ‘*to protect and restore our environment through regulation, scientific knowledge and working with others*’ and would be hugely valuable in achieving the stated vision of the EPA strategy to ‘*live sustainably in a healthy environment that is protected and valued by all*’.

In order to protect, restore and enhance our natural capital, we must first understand the extent and condition of existing natural assets. In other words, we must establish a baseline upon which targets for improvement can be set.

NCI is a partner on the pioneering EPA-funded [INCASE project](#), which is the first project to apply Natural Capital Accounting principles to catchments in Ireland. Natural Capital Accounting reports across four main sets of ecosystem accounts – extent, condition, services and benefits - and presents a standardised platform to collate information and regularly report on progress in relation to climate

actions, biodiversity conservation and restoration, protection of waterbodies, and general good environmental practices (as identified in cross-sectoral areas such as agriculture, energy, environment, forestry, nature, marine, planning and water supply/use policies).

The [INCASE project](#) is piloting this natural capital accounting approach in four river catchments across Ireland. The prevailing natural capital accounting approach at country level is the System of Environmental Economic Accounting ([SEEA](#)), which has been adopted by the UN and is in use by about 90 countries worldwide. The SEEA is a guide to integrating economic, environmental and social data into a single, coherent framework for holistic decision-making. There is a range of articles, blogs and supporting videos available from the INCASE website [here](#). Evidence supporting the approach has been gathered through the [INCASE](#) project and four articles published that are relevant to the EPA Draft Strategic Plan consultation in terms of the natural capital approach and natural capital accounting are listed below:

- 1.1. Farrell C, Aronson J, Daily G, Hein L, Obst C, Woodworth P, Stout J (2021) Natural capital approaches: shifting the UN Decade on Ecosystem Restoration from aspiration to reality. *Restoration Ecology* <https://doi.org/10.1111/rec.13613> (accessed 1st March 2022).

This article highlights a number of initiatives globally that are applying natural capital approaches for national accounting, land use, business support and health and wellbeing.

- 1.2. Farrell CA, Coleman L, Kelly-Quinn M, Obst CG, Eigenraam M, Norton D, O'Donoghue C, Kinsella S, Delargy O, Stout JC (2021) Applying the System of Environmental Economic Accounting-Ecosystem Accounting (SEEA-EA) framework at catchment scale to develop ecosystem extent and condition accounts. *One Ecosystem* 6: e65582. <https://doi.org/10.3897/oneeco.6.e65582> (accessed 1st March 2022).

This article outlines the approach to gathering data to develop extent (developing an asset register) and ecosystem condition accounts at catchment scale.

- 1.3. Farrell CA, Coleman L, Norton D, Kelly-Quinn M, Obst C, Eigenraam M, O'Donoghue C, Kinsella S, Smith F, Sheehy I, Stout JC (2021) Developing peatland ecosystem accounts to guide targets for restoration. *One Ecosystem* 6: e76838. <https://doi.org/10.3897/oneeco.6.e76838> (accessed 1st March 2022).

This article outlines the approach to developing peatland extent and condition accounts at catchment scale to prioritise areas for restoration.

- 1.4. Farrell CA, Stout JC (2020) Irish Natural Capital Accounting for Sustainable Environments: Stage 1 Feasibility Report. www.incaseproject.com URL: <https://www.epa.ie/publications/research/biodiversity/research-322.php> (accessed 1st March 2022).

This report presents a good overview of the UN System of Environmental Economic Accounting Ecosystem Accounting and potential applications in the Irish context.

We encourage the EPA to engage with the Ecosystem Accounts Division of the Central Statistics Office in order to contribute to the task of developing such [Irish ecosystem accounts](#) as part of the EPA Draft Strategic Plan.

On a closing note, NCI feels obliged to highlight the lack of detail in this Strategy. The absence of clear objectives, targets and actions is very disappointing. The *Values and Behaviours* section is also lacking

in detail and imagination. The *Strategic Outcomes* section is extremely vague and unachievable in some instances. For example, the Strategy states that by 2026 *'no regulated activity will have an impact on the environment or public health'*. This is not a valid outcome, as impacts are not always negative and the very nature of some regulated activities is to drive positive impacts. The role of the EPA is surely to regulate activities so that these impacts are sustainable or, indeed, restorative of biodiversity and mitigate climate change. Stating that the EPA *'will have transitioned to having a well-regulated and effective circular economy'* by 2026 is very aspirational and lacks any detail on how this will be achieved. The overall impression that NCI have of this draft Strategic Plan is that it shows no measurable actions, is unachievable in parts and provides no clear guidance or detail on how this Strategy can possibly be implemented.

We hope you find the points above regarding the natural capital approach offer opportunities to expand this Strategy across the whole range of economic, environmental, social and cultural values. Although our response is critical of the draft Strategic Plan in its current format, we would welcome the opportunity to work closely with the EPA in developing a strategy with the natural capital approach embedded in it. Please contact us for clarifications, and further information at researchteam@naturalcapitalireland.com.

